

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In Re:
Bair Hugger Forced Air Warming
Products Liability Litigation

This Document Relates To:

All Actions MDL No.
15-2666 (JNE/FLM)

VIDEOTAPED DEPOSITION

OF

CHRISTOPHER NACHTSHEIM

Minneapolis, Minnesota

Tuesday, November 29, 2016

Reported by:
Amy L. Larson, RPR
Job No. 113495

1 NACHTSHEIM

2 APPEARANCES:

3 ON BEHALF OF 3M:

4 CHRISTIN GARCIA, ESQUIRE

FAEGRE BAKER DANIELS

5 2200 Wells Fargo Center

90 South Seventh Street

6 Minneapolis, MN 55402

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8 DEBORAH LEWIS, ESQUIRE

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9 Minneapolis, MN 55415

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11 FOR THE PLAINTIFF:

12 MICHAEL SACCHET, ESQUIRE

13 CIRESI CONLIN

225 South Sixth Street

14 Minneapolis, MN 55402

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16
17 ALSO PRESENT: Kraig Hildahl, Videographer

1 NACHTSHEIM

2 respect to the forced-air warming device, do
3 you?

4 A. No.

5 Q. The fact that you received consulting fees
6 from Augustine Biomedical or a successor
7 company did not influence your ability to
8 analyze this data, did it?

9 A. I hope not. I don't believe it did. We try
10 to be objective about everything we do. But,
11 no, it wouldn't have affected my analysis of
12 this data.

13 Q. The amounts that you received were normal
14 consulting fees, correct?

15 A. Correct.

16 MS. GARCIA: Object to the form of
17 the question.

18 BY MR. SACCHET:

19 Q. They were nothing out of the ordinary in
20 terms of other fees that you charged other
21 third parties to perform statistical
22 analysis, correct?

23 A. Correct.

24 Q. You were previously asked a series of
25 questions regarding an operating room in a